UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

EPA United States Environmental Protection Agency **Office of Pesticide Programs**

Antimicrobials Division (AD)

November 26, 2014

DP BARCODE: 423177

MRID: 49445700 and 49445701

SUBJECT: Antimicrobial Copper Alloys-Group I

REG. NO.: 82012-1

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use [ ] OR End-use Product [X]

INGREDIENTS:

PC Code(s)	CAS Number	Active Ingredient(s):
022501	7440-50-8	Copper as elemental

TEST LAB: NA

SUBMITTER: Copper Development Association (CDA)

GUIDELINE:

ORGANIZATION: AD\PSB\CTT

REVIEWER: Lynette T. Umez-Eronini

APPROVER: Karen P. Hicks

APPROVED DATE: November 26, 2014

COMMENT: This product is for non-food use.

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November 26, 2014

MEMORANDUM

SUBJECT: Product Chemistry Review for EPA Reg. 82012-1
Product Name: Antimicrobial Copper Alloys-Group I
DP Barcode: 423177

FROM: Lynette T. Umez-Eronini, Chemist Lynette T. Umez-Eronini
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Karen Hicks, Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

TO: Seiichi Murasaki PM#33/Elizabeth Watkins
Regulatory Management Branch I
Antimicrobials Division (7510P)

Applicant: Copper Development Association (CDA)

CODE: (362) Formula Change, Technical

DATE DUE: December 22, 2014

PRODUCT FORMULATION FROM LABEL:

Active Ingredient(s):	% by wt.
Copper	96.2
Other	3.8
Total:	100

BACKGROUND:

The consultant, Technology Sciences Group Inc. on behalf of the registrant Copper Development Association has submitted an amendment to revise the Confidential Statement of Formula (CSF) with additional copper alloy materials and with changes in the certified limits of some of the alloys for an integrated end-use product called Antimicrobial Copper Alloys-Group I. The product is used for the manufacture and fabrication of touch surface components (doorknobs, handrails, etc) for use in hospitals, healthcare facilities, and various public, commercial, and residential buildings. The product is for non-food use.

This submission includes:

1. Cover letter, September 12, 2014.
2. EPA Application for Pesticide (EPA Form 8570-1) with Transmittal Document, September 12, 2014.
3. Certification with Respect to Citation of Data (EPA Form 8570-34), September 12, 2014.
4. Data Matrix, Confidential and Releasable versions (EPA Form 8570-35), September 12, 2014, 6 pages each.
5. Current CSF (EPA Form 8570-4), August 1, 2012.
6. Proposed Revised CSF (EPA Form 8570-4), September 12, 2014.
7. Supporting Reference Chemistry Data Volume – Certified Limits (same as MRID# 49445701 listed below).

MRID	Citation
49445700	Cover letter same as Transmittal Letter: Copper Development Association (CDA) (2014) Submission of Product Chemistry Data in Support of the Amended Registration of Antimicrobial Copper Alloys Group I. Transmittal of 1 Study.
49445701	Reynolds, M. (2014) Antimicrobial Copper Alloys Group I: Supplemental Product Chemistry - Certified Limits. Project Number: CDA/IV/2014/09. Unpublished study prepared by Technology Sciences Group, Inc. 12p.

FINDINGS:

1. Basic CSF, August 1, 2012 and product label, August 26, 2014 are used as references.
2. The nominal concentration of the active ingredient on the Basic CSF, dated September 12, 2014 is consistent with product label, August 26, 2014.
3. MRID # 49445701 shows revisions made to the Group A Product Chemistry section OSCPP 830.1750 Certified Limits are consistent with Basic CSF dated September 12, 2014 and is found acceptable.

4. MRID # 49445701 replaces OSCPP 830.1750 Certified Limits and chemistry information submitted in MRID # 48902901.
5. Changes in the certified limits of the alloys are found acceptable.
6. The Basic Confidential Statement of Formula, dated September 12, 2014 is found acceptable and supersedes all previous CSFs with the same formulation.

CONCLUSION:

The revised Product Chemistry Group A section OCSPP 830.1750 in MRID # 49445701 is acceptable and replaces MRID # 48902901. The basic CSF dated September 14, 2014 is acceptable and supersede all previous CSFs.